

RASSELSTEIN HOESCH GMBH EXCLUSION REQUEST

ATTACHMENT 3 TWIST-OFF MATERIAL

- (a) The designation of the product under a recognized standard or certification (e.g., ASTM, DIN), or the commercial name for the product and the HTS number under which the product enters the United States.

The merchandise subject to this request is known as double reduced electrolytically chromium- or tin-coated steel, micro alloyed, ultra low carbon, vacuum degassed, regardless of temper, finish coating or other properties. This material is for a twist-off end use with limited earing (special minimum earing) below 1 mm (0.0394 inches).

The applicable HTS provisions are: 7210.11.0000, 7210.12.0000, and 7210.50.0000.

- (b) A description of the product based on physical characteristics (e.g. chemical composition, metallurgical properties, dimensions, surface quality) so as to distinguish the products from products for which exclusion is not sought;

See product description in (a) above.

- (c) The basis for requesting an exclusion;

Rasselstein believes that this unique product is not produced in the United States in sufficient quantities.

- (d) The names and locations of any producers, in the United States and foreign countries of the product;

To the best of our knowledge, this material, which is required by can purchasers, is not produced in the United States.

- (e) Total U.S. Consumption of the product, if any, by quantity and value for each year from 1996 to 2000, and the projected annual consumption for each year from 2001 to 2005, with a basis for the projection;

US Consumption:		
1996-2000	100,000 short tons	\$70,000,000

Annual Projection:

2001-05	100,000 short tons	\$70,000,000
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Projections are estimates based on knowledge of actual market consumption and development.

(f) Total US production of the product for each year from 1996 to 2000, if any;

Rasselstein is unable to provide any estimate of total US production, if any.

(g) The identity of any US produced substitute for the product, total US production of the substitute for each year from 1996 to 2000, and the names of any US producers of the substitute;

Rasselstein is unable to identify any practical substitute product. Based upon its experience Rasselstein is convinced that any material available in the US that could possibly be a substitute is below market requirements in quality.

CONCLUSION

We understand that the purpose of the USTR investigation is to determine appropriate remedies for the importation of tin mill products, which are produced by the domestic industry. We believe that US production, if any, of this product is insignificant. Accordingly, we respectfully request twist-off material be excluded from any import restrictions, and that the language of any remedy order for HTS subheadings 7210.11.0000, 7210.12.0000 and 7210.50.0000 clearly exclude this product.